# OPEN PUBLIC INTEREST REPRESENTATION & STATUTORY COMPLAINT

**BEFORE THE COMPETENT AUTHORITIES, GOVERNMENT OF INDIA**

**TO:**

1. **The Secretary, Ministry of Electronics and Information Technology (MeitY),** Government of India
2. **The Director, National Cyber Crime Coordination Centre (I4C),** Ministry of Home Affairs
3. **The Chairperson, National Commission for Women (NCW)**
4. **The Chairperson, National Commission for Protection of Child Rights (NCPCR)**

**SUBJECT:** Urgent intervention and registration of FIR against an organized cyber-terrorism, child endangerment, and digital harassment syndicate operated by Mr. Deepanshu Giri and Lunar Astro Vedic Academy (OPC) Private Limited.

**COMPLAINANT:** Independent Human Rights & Online Fraud Protection Organization (On behalf of anonymized whistleblowers and victims)

**RESPONDENTS / ACCUSED:**

1. Mr. Deepanshu Giri (Director, Lunar Astro Vedic Academy)
2. Administrators of Proxy Facebook Pages: “Lunar Astro Memes” & “Lunar Astro Videos”
3. The Coordinated “Troll Farm” Syndicate (List of operatives annexed below)

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# MOST RESPECTFULLY SHEWETH:

## 1. INTRODUCTION & BACKGROUND

This Open Public Interest Representation is being published and submitted to bring to the immediate attention of the Government of India a highly organized cyber-crime syndicate operating from Indian soil. The primary accused, Mr. Deepanshu Giri, utilizes a corporate entity (Lunar Astro) as a front for financial exploitation, while maintaining a decentralized "Troll Farm" to silence, harass, and digitally assault any consumer or whistleblower who exposes his fraudulent practices.

## 2. GRAVE VIOLATIONS OF INDIAN LAW

The actions of the accused and his proxy network constitute severe, non-bailable offenses under the **Information Technology Act, 2000**, the **Bharatiya Nyaya Sanhita (BNS), 2023**, and the **Protection of Children from Sexual Offences (POCSO) Act**.

**A. Child Endangerment and Digital Morphing** The accused's syndicate has maliciously harvested private photographs of a whistleblower's minor children. These images were digitally altered (morphing animal faces over the minors) and published on the public Facebook page "Lunar Astro Memes" to inflict severe psychological trauma on the family. This is a gross violation of child protection laws and basic human decency.

**B. Outraging the Modesty of Women & Non-Consensual Imagery (NCII)** The syndicate illegally scraped private photographs of the whistleblower's wife, cropped her face, and published the imagery alongside highly obscene, sexually colored captions (e.g., *"Hn bhyii agya swaad"*). This constitutes a direct violation of **Section 66E (Violation of Privacy)** and **Section 67 (Publishing obscene material)** of the IT Act, as well as relevant sections of the BNS pertaining to outraging the modesty of a woman.

**C. Criminal Intimidation and Cyber-Stalking** The accused has utilized these proxy pages to issue explicit, written threats of severe harm, publicly stating: *"If someone will say dirty things... I will make their life hell."* The syndicate

actively stalks the private social media profiles of victims' families to harvest data for ongoing harassment.

## 3. THE CO-CONSPIRATOR SYNDICATE (THE TROLL FARM)

The cyber-harassment campaign is executed by a coordinated syndicate of students, staff, and loyalists acting under the direction of the primary accused. Digital forensics have identified the following individuals as active participants, enforcers, or "Top Fans" facilitating this cyber-terrorism network:

- Manit Verma (Manitt Verma)
- Garima Srivastava (Garim)
- Deeptanu Dev
- Ansh Singh
- Satish Kumar
- Yogita Chaudhary
- Jitin Malik
- Kammal Waddhwa
- Sandhya Singh
- Swati V Jain
- Niharika Sharma Banduni
- Shivi Asthana
- Mayuri Agarwal
- Shivani Gupta Agarwal
- Parveen Siddique
- Sunaina Khandelwal
- निधि यादव (Nidhi Yadav)

## 4. PRAYER / RELIEF SOUGHT

In light of the egregious and ongoing nature of these cyber-crimes, it is most humbly prayed that the Competent Authorities:

1. **DIRECT** Meta Platforms Inc. (Facebook) to immediately suspend, take down, and preserve the data logs of the proxy pages "Lunar Astro Memes" and "Lunar Astro Videos" under Section 69A of the IT Act.

2. **INITIATE** a high-level cyber-forensic investigation through the I4C to trace the IP addresses and MAC addresses of the individuals operating the aforementioned proxy pages.
3. **REGISTER** a First Information Report (FIR) against Mr. Deepanshu Giri and the identified troll farm operatives for cyber-stalking, criminal intimidation, and the digital abuse of women and minor children.

**ISSUED IN THE PUBLIC INTEREST.** *Evidence, including screenshots, URLs, and legal notices, has been preserved and submitted to international cybercrime authorities, including the eSafety Commissioner (Australia).*